GIA Environmental Health and Safety Program Evaluation Standard

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ABSTRACT: The purpose of this GIA standard is to define the basic elements and responsibilities for the establishment and participation in the GIA Environmental Health and Safety (EH & S) Program Evaluation.

APPLICABILITY: This GIA standard shall apply to GIA facilities and operations worldwide, unless superseded by more stringent country and/or local regulations.

STATUS: APPROVED 01-Apr-1991; use VTX SMC for current status.

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1 INTRODUCTION

The purpose of this GIA standard is to ensure that significant Environmental Health and Safety (EH&S) risks are adequately controlled. This includes:

- Assessing compliance with applicable country and local regulations as well as with Digital and GIA Policies and Standards.
- Assessing management systems that are in place to protect the health and safety of employees and the community.
- Noting all deficiencies identified during the course of the evaluation that may have substantial significance to site operations.
- Providing assurance to senior Digital and GIA management that regulatory requirements are being met and that significant risks are being identified and addressed.

The program evaluation supplements ongoing site programs for conducting periodic inspections and self-audits.

Within the Environmental Health and Safety (EH&S) function, a program evaluation reviews the effectiveness of the total program. Program benefits include fulfilling these management expectations:

- Provide assurance to senior management
- Improve overall EH&S performance
- Increase management and employee awareness and acceptance of their EH&S responsibilities
- Identify and control significant risks
- Ensure compliance with laws and regulations
- Maintain and improve public and business image

1.1 SCOPE

This standard shall apply to GIA facilities and operations worldwide unless superseded by more stringent country and/or local regulations.

1.1.1 Policy

A periodic program evaluation shall be conducted to provide GIA management with verification that:

- GIA operations are in compliance with applicable country, local, and internal EH&S requirements.
- Adequate and appropriate management systems are in place and functioning as intended to provide reasonable assurance of continued compliance.
- GIA business operations are designed, constructed, operated, and maintained so that the safety and health of employees, communities, and the environment are properly protected.

1.2 RESPONSIBILITIES

This subhead describes the responsibilities of the persons involved in fulfilling the requirements of this document.

- Site Manager

  Ensure that the elements of an effective EH&S program are in place and functioning.

- Site EH&S Manager

  Implement and maintain an EH&S program consistent with Digital and GIA Policies and Standards and in compliance with country and local regulations.

  Be available, provide input, and assist evaluation teams and their function during plant/site visits.

  Prepare and make available documentation requested by the evaluation team leader (for example, questionnaires, prepare copies of pertinent records, permits, and so forth).

  Have applicable country and local regulations available for team reference.

  Ensure the availability of site management for opening and closing conferences.

  Prepare and follow up with action plans.

  Provide status updates for action plans to the Corporate EH&S Programs Manager.

- Area EH&S Manager

  Assist the site in preparing for the arrival of the program evaluation team.

Coordinate the scheduling of the evaluation with site management.

Be available, as needed, to work with the program evaluation team during their visit.

Follow up on the preparation and implementation of the resulting evaluation action plan.

- Corporate EH&S Programs Manager

  Function as project manager for the GIA EH&S Program evaluation.

  Develop and assist with implementation of the details of the GIA EH&S Program evaluation.

  Assist in defining evaluation priorities, scheduling, and team composition.

  Participate and conduct EH&S evaluations.

  Track the progress of the site action plan.

  Periodically report to senior GIA and Digital management.

1.3 LANGUAGE REQUIREMENT FOR THIS STANDARD

The details of this GIA standard and all documentation associated with it, such as manuals, training materials, signs, labels, postings, and so forth, must be available in English and the accepted and official local languages.

2 PROGRAM DETAIL

This subhead describes the components' functional areas as described in the GIA area specific evaluation protocols. These are available from the GIA area EH&S manager.

2.1 SAFETY AND INDUSTRIAL HYGIENE

Safety and Industrial Hygiene functional areas include:

- Employee safety programs
- Process and equipment safety
- Fire prevention and protection
- Personal protective equipment
- Administrative control programs
- Employee Right-To-Know
- Industrial hygiene
- Emergency preparedness and response
- Injury, illness, and accident record keeping and reporting
- Toxic substance control program

2.2 HEALTH SERVICES

Health Services functional areas include:

- Occupational medicine
- Health Services operations

2.3 ENVIRONMENTAL

Environmental functional areas include:

- Air emission quality
- Water quality control
- Spill prevention
- Solid and hazardous waste management
- PCB management
- Drinking water management
- Hazardous waste site management
- Underground storage tank management
- Waste management
- Emergency preparedness

2.4 HAZARDOUS MATERIALS TRANSPORTATION

Hazardous Materials Transportation functional areas include:

- Handling
- Shipping
- Receiving
- Transportation

3 EVALUATION METHODOLOGY

The objectives of program evaluation are the following.

3.1 EVALUATION OBJECTIVES

Allow a team to independently obtain information evaluating the design and effectiveness of a location's EH&S management system and programs.

Verify compliance with country, local, Digital, and GIA EH&S requirements.

Review findings as the basis for judging a location's EH&S performance relative to the scope of the evaluation.

3.2 EVALUATION ELEMENTS

The important elements of the methodology are the following.

3.2.1 Approach

The approach to evaluate the program elements is as follows.

- Develop an understanding of location's EH&S management systems
- Assess the strengths and weaknesses of the EH&S management systems and programs
- Gather evaluation data
- Evaluate findings
- Verify findings
- Report findings

3.2.2 Quality Control

Program evaluations shall be conducted by EH&S professionals.

- Team leaders and team members are trained in evaluation techniques as well as country and local requirements.

Program evaluations shall be based on written protocols. They shall:

- Reflect the objectives of the evaluation
- Provide a methodology for the desired portion of the evaluation
- Describe specific evaluation tests and procedures to be completed
- Provide desired evaluation guidance documentation (for example, questionnaires, checklists, protocol addendums, and so forth).

Program evaluations shall have a series of internal control checks:

- During the on-site evaluation process with informal team reviews.
- At the completion of the evaluation, protocols and working papers shall be reviewed by the team leader and the Corporate EH&S Programs Manager to confirm that all evaluation steps were completed, adequate evidence was obtained to substantiate the findings, and that the evaluation program procedures were followed.

An outside consultant shall be used in the ongoing design and implementation of the GIA Program Evaluation and shall continue in an active role. The consultant shall:

- Participate on evaluation teams.
- Ensure evaluation consistency.
- Assist the team leader to coordinate on-site activities.
- Write and review the evaluation report for accuracy, consistency, and quality.
- Support ongoing training activities.
- Prepare an annual report of the fiscal year's evaluation activities for GIA.
- Provide external quality assurance that the program is World Class.

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